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June 8, 2012

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Stephanie Thomas vs. City of New York, et al, 11-CV-5978 (BMC)

Honorable Cogan:

Pursuant to the Court's Order, issued June 5, 2012, I file this letter related to additional discovery requests that I shall submit to defendants formally with interrogatories by June 15, 2012.

Plaintiff shall submit requests related to the following documents:

1. All personnel documents related to plaintiff, not previously exchanged, including complete salary/promotional history; any criticisms, commendations, reprimands; employment background questionnaires completed by plaintiff in 1987 through 1989, and those completed by her former employer Wang, pension documents; all documents related to investigations or disciplinary actions or proceedings involving plaintiff, including all recorded statements and findings.
2. All documents relied on by each defendant, or those used or reviewed to refresh recollection or memory in the defense of this action, as it relates to plaintiff or her claims.
3. Documents showing all advertisements or postings for promotions for IT professionals within the agency since 1988 through present; including names, race, sex, nationality of those granted promotions, titles or positions held prior to promotion and as a result of the promotion; applications for promotional/advancement opportunities submitted by Kevin Jones, Ron Maffei, John Adams, and Ronald Abernathy, Phyllis Vickers, Laura Purdle, and plaintiff.
4. All documents related to the development and status of projects CIDS, ECIDS, EPIS, CDA/Datashare DEEP, LawTrac, EEO Training Reference Database, EMS Diversity

Scheduling Database, FDNY Diversity Training Retrieval/Scheduling Database, FDNY Street Lookup Database; including documents related to or containing communications about plaintiff and documents revealing dates of inception and termination in design or development of the project/program, period of use of program, identification of those assigned to work on the project, those who developed it, project updates, project successors, and predecessors.

5. Documents revealing projects assigned to Maybo Linn, in addition to training opportunities provided her, include dates of assignments; documents revealing Ms. Linn's responsibilities and current salary; documents related to those who applied for Ms. Linn's position as IT Project Manager, including their complete applications, personnel documents considered or reviewed in the selection process, and applicants salary/promotional histories; include data related to race, sex, nationality of all who applied for the position.
6. All complete employment applications, including those for promotions or advanced training opportunities, evaluations/rebuttals, any investigations and findings, salary/promotional histories, disciplinary actions or criticisms/complaints--including EEO-related issues, commendations, bonuses, rewards, and any documents related to promotions, terminations, or resignations, for Linda Shang, Carol Chodes, Simpria Shapiro, K. Deol, Phyllis Vickers, A. Barnes, Ron Maffei, Laura Purdle, Maybo Linn, Jeffrey Moore, David Litvin, Kevin Jones, Ronald Abernathy, John Adams, Jason Cheng, Computer Specialist S. Feldman, William Minus, and T. Tokareva.
7. Documents containing any statements of defendants or other employees related to plaintiff, her claims, or these lawsuits, include any transcripts, email communications, reports, etc.
8. Documents identifying race, nationality, sex of each person hired and/or appointed in 1987—1989 as a computer professional, indicate specific title awarded.
9. Copies of the Department's Awards Journals since 1988 through present.
10. All documents related to selection process of individuals for the following current managerial positions, including but not limited to advertisements/postings, applications from candidates, dates of appointments, evaluations and statements regarding candidates, the identity of individuals, including name, race, nationality, sex of each applicant: Programming Deputy Director; Manager of Database Group; BHS Grant managers and ECIDS Group Project Manager.

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11. Documents showing the duties and responsibility for the Application Manager and Project Manager of BHS Grant, Deputy Director of Network Services, and Deputy Director of Computer Services.
12. Documentation identifying the first African American civil servant computer specialist at the FDNY.
13. All documents revealing training, promotions, raises given since 1987 in IT; documents identifying name, race, nationality, and sex of those receiving it.
14. Documents showing the race, nationality, and sex of those hired, assigned training opportunities, and/or promoted by Jason Cheng and John Adams during their tenure as managers; documents identifying the specific salary, position, and/or training opportunities proffered.
15. Advertisement or postings for all 2007 IT promotional opportunities; copies of all applications submitted by candidates and other documents considered in selection process; and any document revealing the race, sex, and nationality of each applicant.
16. Documents related to Jason Cheng's statements or complaint concerning his discussion with plaintiff in March 2009, as described in paragraph 72, 73 of the Second Amended Complaint.
17. All document related to meetings involving plaintiff and her supervisors/managers.
18. Statistical data regarding EEO complaints filed internally since 1987, and copies of complaints filed by IT professionals.
19. The FDNY information technology (IT) organizational chart for each year beginning 1987 through present and documents providing data as salaries, race, nationality, religion, sex of IT employees; the current organizational chart for the entire FDNY.

Plaintiff shall provide with service of the formal written demands, complete search words for e-discovery.

Upon permission of the Court, plaintiff would like to supplement or amend these demands after the 6/15/2012 deadline, as the development of discovery warrants, in the interest of justice.

Respectfully submitted,
Melissa Pressley